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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

ASHLEY SCHROEDER, et al.,

Plaintiffs,

v.

UNIVERSITY OF OREGON,

Defendant.

Case No. 6:23-cv-01806-MC

**DECLARATION OF SARAH J.
CROOKS IN SUPPORT OF
DEFENDANT'S MOTION FOR
PROTECTIVE ORDER**

I, Sarah J. Crooks, declare as follows:

1. I am an attorney licensed to practice law in the State of Oregon and am admitted to practice before this Court. I am a partner with the law firm of Perkins Coie LLP, and counsel of record for Defendant the University of Oregon (the "University") in the above-captioned matter. I have personal knowledge of the facts stated herein, and if called up to do so, could and would testify competently thereto. I submit this declaration in support of Defendant's Motion for Protective Order.

2. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' First Set of Interrogatories to the University served on April 26, 2024.

1- DECLARATION OF SARAH J. CROOKS IN
SUPPORT OF DEFENDANT'S MOTION FOR
PROTECTIVE ORDER

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3. Attached as Exhibit 2 is a true and correct copy of Plaintiffs' First Requests for Production of Documents to the University served on April 26, 2024.

4. On June 11, 2024, the University served its responses and objections to Plaintiffs' First Requests for Production of Documents and First Set of Interrogatories. In July 2024, the University also produced certain priority documents pursuant to Plaintiffs' counsel's request for use in preparing for the parties' judicial settlement conference with Judge Beckerman on July 18–19, 2024.

5. Plaintiffs did not follow up on the University's document production or responses and objections to their initial discovery requests until October 31, 2024, when Plaintiffs' counsel sent an email to the University's counsel.

6. Attached as Exhibit 3 is a true and correct copy of Plaintiffs' Second Set of Requests for Production of Documents to the University served on December 10, 2024.

7. Attached as Exhibit 4 is a true and correct copy of Plaintiffs' Second Set of Interrogatories to the University served on December 10, 2024.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED at Portland, Oregon, this 14th day of January, 2025.

By: /s/ Sarah J. Crooks
Sarah J. Crooks